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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,) Case No.: 2:14-cr-280-JCM-GWF
10 Plaintiff,)
11 vs.) **Stipulation to Extend Time for
12 DOMINQUE WELLS,) Government's Response to Defendant's
13 Defendant.) Compassionate Release Motion**
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16)
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15 IT IS HEREBY STIPULATED AND AGREED, by and between Assistant United
16 States Attorney Elizabeth O. White, counsel for the United States of America; and
17 Assistant Federal Public Defender Katherine Tanaka, counsel for Dominque Wells, that
18 the government's response to Mr. Wells's Motion for Compassionate Release (ECF No.
19 404) be extended by 7 days, to and including January 18, 2022.

20 This stipulation is entered into for the following reasons:

21 1. Mr. Wells filed his motion on January 4, 2022. *See* ECF No. 403.
22 2. Pursuant to the District Court's General Order Regarding such motions, the
23 government's response is due seven days after the motion is filed, which is January 11,
24 2022. *See* Amended General Order 2020-06 (D. Nevada, Sept. 3, 2020).

1 3. Undersigned government counsel, who is handling this matter, is presenting
2 oral argument in the Ninth Circuit in *United States v. Hylton*, CA No. 21-10026, on January
3 11. The *Hylton* appeal was briefed by another appellate division attorney, who was recently
4 appointed to the state court bench by Governor Sisolak and left the U.S. Attorney's Office.
5 Because undersigned government counsel did not brief the *Hylton* case, she has had to
6 spend most of the past week reviewing the record in that case and preparing for oral
7 argument. In light of that work, the government believes it will need additional time, to
8 and including January 18, 2022, to review Wells's motion and other records, and prepare
9 and file the government's response.

10 4. Wells's counsel consents to this extension of time.

11 DATED this 10th day of January, 2022.

12 RENE L. VALLADARES
13 Federal Public Defender

 CHRISTOPHER CHIOU
 Acting United States Attorney

14 By: *s/ Katherine Tanaka*
15 Katherine Tanaka
16 Asst. Federal Public Defender
17 *Counsel for Dominque Wells*

18 By: *s/ Elizabeth O. White*
19 Elizabeth O. White
20 Assistant United States Attorney
21 *Counsel for the United States*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Based on the Stipulation of counsel and good cause appearing,

IT IS THEREFORE ORDERED that the government's response to Defendant's Motion for Compassionate Release (ECF No. 404) be due on January 18, 2022.

DATED January 10, 2022.

James C. Mahan
UNITED STATES DISTRICT JUDGE